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April 2, 2021

Hon. Lewis J. Liman
United States Courthouse
Courtroom 17A
500 Pearl Street
New York, New York 10007

**Re: Eastern Profit Corp. Ltd. v. Strategic Vision US, LLC, Case No. 18-cv-2185 (LJL)-
DCF/Strategic Vision's Trial Witness Bob Fu**

Dear Judge Liman:

This letter responds to misstatements made in Eastern Profit's opposition to the proposed testimony of Dr. Bob Fu. First, it is false that Dr. Fu was first disclosed to Eastern just days before the January 19, 2021 trial. He was disclosed directly to counsel the week of January 11, 2021, *after* the January 19, 2021 trial was postponed to allow an in-person trial. Next, Eastern incorrectly claims that Strategic sought multiple postponements of trial. In fact, Strategic has consistently been prepared for trial and has never asked for a continuance; instead, it has fought for in-person proceedings. The inability to hold such proceedings until recently has regrettably caused continuances. Additionally, discovery into Guo's status was sharply curtailed, lasted only a few months, and did not involve double-digit depositions. The fraud claim involving Guo's status was not added until July 19, 2019, and fact discovery closed on November 29, 2019. This included a month of near-inactivity in September when Eastern's last attorneys lost authority to act but its current counsel had not yet entered. Most of Strategic's investigation of Guo's status had to involve third-party discovery and informal fact-gathering.

That is why it is all the more important to hear from Dr. Fu, a man who sustained not only "social media" attacks from Guo and his media entities, but actual physical threats and harassment from Guo's U.S. followers. Dr. Fu will be competent to explain his own history and his completely friendly relations with Guo until Guo abruptly organized in-person harassment of Dr. Fu and his family. We cannot peer into Guo's mind, but we can judge him by his acts: his movement of money, his choice of Mainland-connected associates, his recorded statements, and his campaigns against people like Dr. Fu. Dr. Fu's thirty minutes of testimony will help the Court understand who Guo really is, and why Strategic was defrauded.

Respectfully submitted,



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